

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOARD OF TRUSTEES OF THE LOCAL)
UNION NO. 422 U.A. OF JOLIET,)
ILLINOIS PENSION FUND AND)
BOARD OF TRUSTEES OF THE LOCAL)
UNION NO. 422 U.A. OF JOLIET,) No. 10 C 4953
ILLINOIS WELFARE FUND,)
Plaintiffs,) Judge Der-Yeghiayan
v.)) Magistrate Judge Keys
NAAL PLUMBING AND HEATING)
CO., an Illinois corporation, and)
FRANCES NAAL)
Defendant.)

MOTION TO REINSTATE

NOW COMES, the Plaintiffs, by and through their attorneys, Donald D. Schwartz, Thomas R. Allen, ARNOLD AND KADJAN, and in support of reinstatement, states as follows:

1. A Complaint was filed August 6, 2010.
2. The Summons and Complaint were served August 12, 2010 and October 1, 2010 and the certificates of service were filed September 1, 2010 and November 4, 2010.
3. This Honorable Court entered an Order dated December 7, 2010 dismissing this matter without prejudice.
4. A copy of the Order, entered by this Honorable Court, was mailed with the motion.
5. Defendant was ordered to pay to Plaintiffs **\$5,415.00** on January 15, 2010 and followed by monthly payments of **\$5,415.00** per month on the

Fifteenth day of each month for the succeeding sixteen months and final payment of **\$5,415.00** on June 15, 2011 for a total paid of **\$97,470.00** including interest.

6. Defendant defaulted on the installment note payment due February 15, 2011, which leaves the unpaid total balance of **\$27,075.00**.
7. Per the terms of the dismissal, this court retained jurisdiction to reinstate upon default.

WHEREFORE, Plaintiffs pray that this Court enter an order reinstating this matter and enter judgment for **\$27,075.00**, the amount due on the defaulted repayment agreement.

Respectfully submitted,

BOARD OF TRUSTEES OF THE
NORTHERN ILLINOIS BENEFIT FUND,
et al.

s/ Thomas R. Allen
One of their Attorneys

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